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2 United States Attorney

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DAVID W. SHAPIRO  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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5 **SEALED**  
6 **BY COURT ORDER**

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

**WHA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie,"  
15 ELSA FLORIVET DIAZ-REYES,  
a/k/a "Flor," a/k/a "Flo,"  
16 JOSE AGUILAR,  
17 FRANCISCO MORENO-ALATORRE,  
a/k/a "Paco,"  
18 CRESCENCIO ROSALES, a/k/a "Felipe,"  
19 TONY GARCIA-SANCHEZ, a/k/a "Pollo,"  
20 SALVADOR ALMAZAN-CHAVA,  
21 MARTIN MORENO,  
22 CONSUELO MENDOZA,  
23 CRISTOBAL ESTRADA, a/k/a "Pichin,"  
24 ALALVERTO VELASQUEZ,  
25 JOSE DIAZ, a/k/a "Walter,"  
26 ADOLFO FAJARDO, a/k/a "Raul,"  
27 HATHAN GRIFFIN, a/k/a "Dolomite,"  
28 BURGESS CROSBY, a/k/a "Indio,"  
DANIEL BRUNO, a/k/a "Danny,"  
HERMAN MARENA, a/k/a "Carias,"  
BENNY JASPER,  
ROY LEE BUTLER, a/k/a "Strawberry,"  
REGGIE MILLER,  
ALLEN BOBO, a/k/a "Baby A,"  
LEON HOFFMAN, a/k/a Leon Stewart,  
DARRYL MCQUILLION,  
MICHAEL HARRIS,  
BALTAZAR MATA, a/k/a "Balta,"  
EMILIO SANCHEZ,  
MANUEL MORALES,  
a/k/a "Manny," a/k/a "El Barbon,"  
Defendants.

**CR-01 - 0423**

INDICTMENT

FILED UNDER SEAL

VIOLATIONS: 21 U.S.C. § 841(a)(1) -  
Possession With Intent to Distribute Heroin  
and Cocaine and Distribution of Heroin; 21  
U.S.C. § 846 - Conspiracy to Distribute and  
to Possess With Intent to Distribute Heroin;  
21 U.S.C. § 843(b) - Use of Communication  
Facility to Commit a Drug Crime; 18 U.S.C.  
§ 1956 - Money Laundering; 18 U.S.C. § 2  
- Aiding and Abetting

SAN FRANCISCO VENUE

1 The Grand Jury charges:

2 COUNT ONE: (21 U.S.C. § 846)

3 In or about and between January 2000 and May 2001, both dates being approximate and  
4 inclusive, in the Northern District of California, and elsewhere, the defendants

5 HERIBERTO CORIA-CERDA, a/k/a "Eddie,"  
6 ELSA FLORIVET DIAZ-REYES, a/k/a "Flor," a/k/a "Flo,"  
7 JOSE AGUILAR,  
8 FRANCISCO MORENO-ALATORRE, a/k/a "Paco,"  
9 CRESCENCIO ROSALES, a/k/a "Felipe,"  
10 TONY GARCIA-SANCHEZ, a/k/a "Pollo,"  
11 SALVADOR ALMAZAN-CHAVA,  
12 MARTIN MORENO,  
13 CONSUELO MENDOZA,  
14 CRISTOBAL ESTRADA, a/k/a "Pichin,"  
15 ALALVERTO VELASQUEZ,  
16 JOSE DIAZ, a/k/a "Walter,"  
17 ADOLFO FAJARDO, a/k/a "Raul,"  
18 HATHAN GRIFFIN, a/k/a "Dolomite,"  
BURGESS CROSBY, a/k/a "Indio,"  
DANIEL BRUNO, a/k/a "Danny,"  
HERMAN MARENA, a/k/a "Carias,"  
BENNY JASPER,  
ROY LEE BUTLER, a/k/a "Strawberry,"  
REGGIE MILLER,  
ALLEN BOBO, a/k/a "Baby A,"  
LEON HOFFMAN, a/k/a Leon Stewart,  
DARRYL MCQUILLION,  
MICHAEL HARRIS,  
BALTAZAR MATA, a/k/a "Balta,"  
EMILIO SANCHEZ,  
MANUEL MORALES, a/k/a "Manny," a/k/a "El Barbon,"

19 and others, did knowingly and intentionally conspire to possess with intent to distribute, and to  
20 distribute, a Schedule I controlled substance, to wit: one kilogram or more of a mixture or  
21 substance containing a detectable amount of heroin, in violation of Title 21, United States Code,  
22 Section 846.

1 COUNTS TWO THROUGH ELEVEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about the following dates, in the Northern District of California, the defendant

3 ELSA FLORIVET DIAZ-REYES,  
4 a/k/a "Flor,"  
a/k/a "Flo"

5 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
6 controlled substance, to wit: heroin, in violation of Title 21, United States Code, Section  
7 841(a)(1) and Title 18, United States Code, Section 2:

| 8 <u>Count</u> | <u>Date</u>       |
|----------------|-------------------|
| 9 Two          | February 2, 2000  |
| 10 Three       | February 8, 2000  |
| 11 Four        | February 22, 2000 |
| 12 Five        | March 8, 2000     |
| 13 Six         | April 6, 2000     |
| 14 Seven       | May 8, 2000       |
| 15 Eight       | June 1, 2000      |
| 16 Nine        | June 29, 2000     |
| 17 Ten         | August 4, 2000    |
| 18 Eleven      | November 1, 2000  |

19  
20 COUNT TWELVE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

21 On or about March 10, 2001, in the Northern District of California, the defendants

22 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie,"  
23 SALVADOR ALMAZAN-CHAVA, and  
24 HATHAN GRIFFIN,  
a/k/a "Dolomite"

25 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
26 substance, to wit: heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
27 Title 18, United States Code, Section 2.

1 COUNT THIRTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about March 10, 2001, in the Northern District of California, the defendants

3 HERIBERTO CORIA-CERDA,  
4 a/k/a "Eddie,"  
5 ELSA FLORIVET DIAZ-REYES,  
6 a/k/a "Flor,"  
a/k/a "Flo," and  
CRISTOBAL ESTRADA,  
a/k/a "Pichin"

7 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
8 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
9 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
10 States Code, Section 2.

11  
12 COUNT FOURTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

13 On or about March 10, 2001, in the Northern District of California, the defendants

14 ELSA FLORIVET DIAZ-REYES,  
15 a/k/a "Flor,"  
a/k/a "Flo," and  
16 ALLEN BOBO,  
a/k/a "Baby A"

17 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
18 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
19 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
20 States Code, Section 2.

21  
22 COUNT FIFTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

23 On or about March 13, 2001, in the Northern District of California, the defendants

24 ELSA FLORIVET DIAZ-REYES,  
25 a/k/a "Flor,"  
a/k/a "Flo,"  
26 SALVADOR ALMAZAN-CHAVA, and  
HATHAN GRIFFIN,  
a/k/a "Dolomine"

27 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
28 substance, to wit: heroin, in violation of Title 21, United States Code, Section 841(a)(1) and

1 Title 18, United States Code, Section 2.

2  
3 COUNT SIXTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

4 On or about March 18, 2001, in the Northern District of California, the defendants

5 ELSA FLORIVET DIAZ-REYES,  
6 a/k/a "Flor,"  
a/k/a "Flo," and  
7 EMILIO SANCHEZ

8 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
9 substance, to wit: heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
10 Title 18, United States Code, Section 2.

11  
12 COUNT SEVENTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

13 On or about March 21, 2001, in the Northern District of California, the defendants

14 HERIBERTO CORIA-CERDA,  
15 a/k/a "Eddie," and  
SALVADOR ALMAZAN-CHAVA

16 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
17 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
18 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
19 States Code, Section 2.

20  
21 COUNT EIGHTEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

22 On or about March 24, 2001, in the Northern District of California, the defendants

23 HERIBERTO CORIA-CERDA,  
24 a/k/a "Eddie," and  
BENNY JASPER

25 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
26 controlled substance, to wit: 100 grams or more of a mixture or substance containing a  
27 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
28 Title 18, United States Code, Section 2.

INDICTMENT

1 COUNT NINETEEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about March 25, 2001, in the Northern District of California, the defendants

3 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie,"  
4 ELSA FLORIVET DIAZ-REYES,  
a/k/a "Flor,"  
5 a/k/a "Flo," and  
6 HERMAN MARENA,  
a/k/a "Carias"

7 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
8 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
9 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
10 States Code, Section 2.

11  
12 COUNT TWENTY: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

13 On or about March 26, 2001, in the Northern District of California, the defendants

14 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie," and  
15 ELSA FLORIVET DIAZ-REYES,  
a/k/a "Flor,"  
16 a/k/a "Flo"

17 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
18 controlled substance, to wit: 100 grams or more of a mixture or substance containing a  
19 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
20 Title 18, United States Code, Section 2.

21  
22 COUNT TWENTY-ONE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

23 On or about March 27, 2001, in the Northern District of California, the defendants

24 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie," and  
25 BALATAZAR MATA,  
26 a/k/a "Balta"

27 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
28 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount

1 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
2 States Code, Section 2.

3  
4 COUNT TWENTY-TWO: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

5 On or about March 29, 2001, in the Northern District of California, the defendant

6 HERMAN MARENA,  
7 a/k/a "Carias"

8 did knowingly and intentionally possess with intent to distribute heroin, a Schedule I controlled  
9 substance, and 50 grams or more of a mixture or substance that contains cocaine base, a Schedule  
10 II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title  
11 18, United States Code, Section 2.

12  
13 COUNT TWENTY-THREE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

14 On or about April 14, 2001, in the Northern District of California, the defendants

15 HERIBERTO CORIA-CERDA,  
16 a/k/a "Eddie,"  
17 TONY GARCIA-SANCHEZ,  
a/k/a "Pollo," and  
DARRYL MCQUILLION

18 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
19 substance, to wit: heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
20 Title 18, United States Code, Section 2.

21  
22 COUNT TWENTY-FOUR: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

23 On or about April 20, 2001, in the Northern District of California, the defendants

24 HERIBERTO CORIA-CERDA,  
25 a/k/a "Eddie," and  
26 TONY GARCIA-SANCHEZ,  
a/k/a "Pollo"

27 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
28 controlled substance, to wit: heroin, in violation of Title 21, United States Code, Section

1 841(a)(1) and Title 18, United States Code, Section 2.

2  
3 COUNT TWENTY-FIVE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

4 On or about April 20, 2001, in the Northern District of California, the defendants

5 ELSA FLORIVET DIAZ-REYES,  
6 a/k/a "Flor,"  
7 a/k/a "Flo,"  
8 TONY GARCIA-SANCHEZ,  
9 a/k/a "Pollo," and  
10 ROY LEE BUTLER,  
11 a/k/a "Strawberry"

12 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
13 controlled substance, to wit: heroin, in violation of Title 21, United States Code, Section  
14 841(a)(1) and Title 18, United States Code, Section 2.

15  
16 COUNT TWENTY-SIX: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

17 On or about April 22, 2001, in the Northern District of California, the defendants

18 HERIBERTO CORIA-CERDA,  
19 a/k/a "Eddie," and  
20 MICHAEL HARRIS

21 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
22 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
23 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
24 States Code, Section 2.  
25  
26  
27  
28



1 COUNT TWENTY-SEVEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about April 28, 2001, in the Northern District of California, the defendants

3 HERIBERTO CORIA-CERDA,  
4 a/k/a "Eddie,"  
5 ELSA FLORIVET DIAZ-REYES,  
6 a/k/a "Flor,"  
7 a/k/a "Flo,"  
8 TONY GARCIA-SANCHEZ,  
9 a/k/a "Pollo," and  
10 REGGIE MILLER

11 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
12 controlled substance, to wit: heroin, in violation of Title 21, United States Code, Section  
13 841(a)(1) and Title 18, United States Code, Section 2.

14 COUNT TWENTY-EIGHT: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

15 On or about May 1, 2001, in the Northern District of California, the defendants

16 ELSA FLORIVET DIAZ-REYES,  
17 a/k/a "Flor,"  
18 a/k/a "Flo,"  
19 TONY GARCIA-SANCHEZ,  
20 a/k/a "Pollo," and  
21 ADOLFO FAJARDO,  
22 a/k/a "Raul"

23 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
24 substance, to wit: heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
25 Title 18, United States Code, Section 2.

26 COUNT TWENTY-NINE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

27 On or about May 1, 2001, in the Northern District of California and the District of  
28 Oregon, the defendants

JOSE AGUILAR,  
FRANCISCO MORENO-ALATORE,  
a/k/a "Paco,"  
HERIBERTO CORIA-CERDA,  
a/k/a "Eddie," and  
CRESCENCIO ROSALES,  
a/k/a "Felipe"

did knowingly and intentionally possess with intent to distribute a Schedule I controlled

1 substance, to wit: one kilogram or more of a mixture or substance containing a detectable  
2 amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18,  
3 United States Code, Section 2.

4  
5 COUNT THIRTY: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

6 On or about May 10, 2001, in the Northern District of California, the defendants

7 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie,"  
8 TONY GARCIA-SANCHEZ,  
a/k/a "Pollo," and  
9 LEON HOFFMAN,  
a/k/a Leon Stewart

10 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
11 controlled substance, to wit: heroin, in violation of Title 21, United States Code, Section  
12 841(a)(1) and Title 18, United States Code, Section 2.

13  
14 COUNT THIRTY-ONE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

15 On or about May 13, 2001, in the Northern District of California, the defendants

16 HERIBERTO CORIA-CERDA,  
a/k/a "Eddie," and  
17 TONY GARCIA-SANCHEZ,  
18 a/k/a "Pollo"

19 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
20 controlled substance, to wit: 100 grams or more of a mixture or substance containing a  
21 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
22 Title 18, United States Code, Section 2.

23  
24 COUNT THIRTY-TWO: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

25 On or about May 13, 2001, in the Northern District of California, the defendant

26 JOSE DIAZ,  
a/k/a "Walter"

27 did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture  
28 or substance containing a detectable amount of heroin, a Schedule I controlled substance, and 50

grams or more of a mixture or substance that contains cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE: (18 U.S.C. §§ 1956(a)(2)(B)(i) and 2)

On or about and between April 13, 2001 and April 26, 2001, both dates being approximate and inclusive, in the Northern District of California and elsewhere, the defendants

HERIBERTO CORIA-CERDA,  
a/k/a "Eddie,"  
MARTIN MORENO, and  
CONSUELO MENDOZA

did knowingly and intentionally transport, transmit and transfer United States currency, which represented the proceeds of the sale of heroin, from a place inside the United States to Mexico, knowing that the currency represented the proceeds of some form of unlawful activity and knowing that the transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, source, ownership and control of the proceeds of the distribution of heroin, in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

COUNTS THIRTY-FOUR THROUGH SIXTY-EIGHT: (21 U.S.C. § 843(b))

On or about the following dates, in the Northern District of California, the following defendants did knowingly and intentionally use a communication facility (a telephone), in committing, causing, and facilitating the commission of the offense set forth in Count One of this indictment (and incorporated here by reference), in violation of Title 21, United States Code, Section 843(b):

| <u>Count</u> | <u>Date</u>   | <u>Defendants</u>   |
|--------------|---------------|---|
| 34           | March 9, 2001 | CRISTOBAL ESTRADA, a/k/a Pichin, and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"    |
| 35           | March 9, 2001 | ROY LEE BUTLER, a/k/a "Strawberry," and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo" |

|    |    |                |   |
|----|----|----------------|---|
| 1  | 36 | March 10, 2001 | HATHAN GRIFFIN, a/k/a "Dolomite," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                   |
| 2  | 37 | March 10, 2001 | DANIEL BRUNO, a/k/a "Danny," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                        |
| 3  |    |                |   |
| 4  | 38 | March 10, 2001 | ALLEN BOBO, a/k/a "Baby A," and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"       |
| 5  |    |                |   |
| 6  | 39 | March 12, 2001 | ADOLFO FAJARDO, a/k/a "Raul," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                       |
| 7  |    |                |   |
| 8  | 40 | March 13, 2001 | HATHAN GRIFFIN, a/k/a "Dolomite," and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo" |
| 9  |    |                |   |
| 10 | 41 | March 15, 2001 | BENNY JASPER, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                                       |
| 11 | 42 | March 18, 2001 | EMILIO SANCHEZ, and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"                   |
| 12 |    |                |   |
| 13 | 43 | March 18, 2001 | BURGESS CROSBY, a/k/a "Indio," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                      |
| 14 |    |                |   |
| 15 | 44 | March 24, 2001 | BENNY JASPER, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                                       |
| 16 | 45 | March 25, 2001 | HERMAN MARENA, a/k/a "Carias," and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"    |
| 17 |    |                |   |
| 18 | 46 | March 26, 2001 | ROY LEE BUTLER, a/k/a "Strawberry," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                 |
| 19 |    |                |   |
| 20 | 47 | March 27, 2001 | CRISTOBAL ESTRADA, a/k/a "Pichin," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                  |
| 21 | 48 | March 27, 2001 | BALTAZAR MATA, a/k/a "Balta," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                       |
| 22 |    |                |   |
| 23 | 49 | March 28, 2001 | EMILIO SANCHEZ, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                                     |
| 24 | 50 | March 30, 2001 | REGGIE MILLER, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                                      |
| 25 |    |                |   |
| 26 | 51 | March 30, 2001 | BALTAZAR MATA, a/k/a "Balta," and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"     |
| 27 |    |                |   |
| 28 |    |                |   |

|    |    |                |  |
|----|----|----------------|--|
| 1  | 52 | April 1, 2001  | ALLEN BOBO, a/k/a "Baby A," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                  |
| 2  | 53 | April 3, 2001  | BURGESS CROSBY, a/k/a "Indio," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"               |
| 3  |    |                |  |
| 4  | 54 | April 12, 2001 | DARRYL MCQUILLON, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                            |
| 5  | 55 | April 12, 2001 | ALALVERTO VELASQUEZ, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                         |
| 6  |    |                |  |
| 7  | 56 | April 14, 2001 | DARRYL MCQUILLON, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                            |
| 8  | 57 | April 19, 2001 | DANIEL BRUNO, a/k/a "Danny," and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                 |
| 9  |    |                |  |
| 10 | 58 | April 20, 2001 | ALALVERTO VELASQUEZ, and<br>ELSA FLORIVET DIAZ-REYES, a/k/a "Flor,"<br>a/k/a "Flo"       |
| 11 |    |                |  |
| 12 | 59 | April 22, 2001 | MICHAEL HARRIS, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                              |
| 13 | 60 | April 23, 2001 | MICHAEL HARRIS, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                              |
| 14 |    |                |  |
| 15 | 61 | April 23, 2001 | HERIBERTO CORIA-CERDA, a/k/a "Eddie," and<br>JOSE AGUILAR                                |
| 16 | 62 | April 25, 2001 | ADOLFO FAJARDO, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                              |
| 17 |    |                |  |
| 18 | 63 | April 28, 2001 | REGGIE MILLER, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                               |
| 19 | 64 | May 1, 2001    | ADOLFO FAJARDO, and<br>HERIBERTO CORIA-CERDA, a/k/a "Eddie"                              |
| 20 |    |                |  |
| 21 | 65 | May 1, 2001    | HERIBERTO CORIA-CERDA, a/k/a "Eddie," and<br>JOSE AGUILAR                                |
| 22 | 66 | May 1, 2001    | HERIBERTO CORIA-CERDA, a/k/a "Eddie," and<br>CRESCENCIO ROSALES, a/k/a "Felipe"          |
| 23 |    |                |  |
| 24 | 67 | May 1, 2001    | HERIBERTO CORIA-CERDA, a/k/a "Eddie," and<br>FRANCISCO MORENO- ALATORRE, a/k/a<br>"Paco" |
| 25 |    |                |  |
| 26 |    |                |  |
| 27 |    |                |  |
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1 68

May 13, 2001

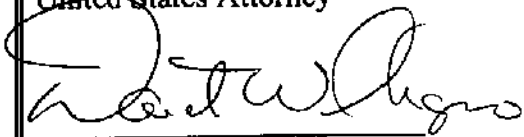
HERIBERTO CORIA-CERDA, a/k/a "Eddie," and  
TONY GARCIA-SANCHEZ, a/k/a "Pollo"


3 DATED:

A TRUE BILL.

5 FOREPERSON

6 DAVID W. SHAPIRO  
United States Attorney

7   
8  
9 LESLIE R. CALDWELL  
Chief, Criminal Division

10  
11 (Approved as to form:   
12 XUSA BUNZEL

28  
INDICTMENT

1 DAVID W. SHAPIRO (NYSBN 2054054)  
2 United States Attorney

ORIGINAL  
FILED

NOV - 6 2001

3  
4 **SEALED**  
5 **BY COURT ORDER**

RICHARD M. VAUGHAN  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

**CR-01 - 0424**

11 UNITED STATES OF AMERICA,

No.

12 Plaintiff,

13 v.

**INDICTMENT**

**FILED UNDER SEAL**

**VRW**

14 LUIS MANUEL GARCIA HERNANDEZ,

a/k/a Piojo,

15 JOSE ISABEL VALDIVIA ANDALUZ,

a/k/a Chavelo,

16 RAMIRO LUCATERO HERNANDEZ,

a/k/a Millo,

17 ALEJANDRO BERBER BARRETO,

a/k/a Alex,

18 FERNANDO LUCATERO PENA,

a/k/a Salvador Jimenez,

19 a/k/a Elodio Lucatero Arreguin,

a/k/a Chava,

20 RUBEN RIVERA,

21 JUAN CARLOS CHAVEZ,

JAVIER LNU, ✓

22 MIGUEL MENDOZA,

FRANCISCA ALVARADO LOPEZ,

a/k/a Angelica,

a/k/a Chaparra,

24 LUISA HERNANDEZ ESPINOSA,

a/k/a Luisa Lucatero-Hernandez,

25 HERIBERTO CORIA-CERDA,

a/k/a Eddie,

26 LEO LNU, ✓

TEOFILO MEDINA-GUIZAR,

27 JOSE LUIS JARAMILLO,

a/k/a Jaimito,

28 MANUEL JESUS CHACON,

a/k/a Chato,

Defendants.

VIOLATIONS: 21 U.S.C. § 841(a)(1) -  
Possession with Intent to Distribute and  
Distribution of Heroin; 21 U.S.C. § 846 -  
Conspiracy to Possess with Intent to  
Distribute and to Distribute Heroin; 21  
U.S.C. § 843(b) - Use of a Communication  
Facility to Commit a Drug Crime; 31 U.S.C.  
§§ 5316 and 5322(a) - Failure to Report  
Exporting Monetary Instruments; 18 U.S.C.  
§ 2 - Aiding and Abetting

SAN FRANCISCO VENUE

1 The Grand Jury charges:

2 COUNT ONE: (21 U.S.C. § 846)

3 Beginning on a date unknown, but no later than in or about January 2001, and continuing  
4 to on or about October 13, 2001, both dates being approximate and inclusive, in the Northern  
5 District of California and elsewhere, the defendants

6 LUIS MANUEL GARCIA HERNANDEZ,  
7 a/k/a Piojo,  
8 JOSE ISABEL VALDIVIA ANDALUZ,  
9 a/k/a Chavelo,  
10 RAMIRO LUCATERO HERNANDEZ,  
11 a/k/a Millo,  
12 ALEJANDRO BERBER BARRETO,  
13 a/k/a Alex,  
14 FERNANDO LUCATERO PENA,  
15 a/k/a Salvador Jimenez,  
16 a/k/a Elodio Lucatero Arreguin,  
17 a/k/a Chava,  
18 RUBEN RIVERA,  
19 JUAN CARLOS CHAVEZ,  
20 JAVIER LNU,  
21 MIGUEL MENDOZA,  
22 FRANCISCA ALVARADO LOPEZ,  
23 a/k/a Angelica,  
24 a/k/a Chaparra,  
25 LEO LNU,  
26 TEOFILO MEDINA-GUIZAR,  
27 JOSE LUIS JARAMILLO,  
28 a/k/a Jaimito,  
MANUEL JESUS CHACON,  
a/k/a Chato

19 and others, did knowingly and intentionally conspire to possess with intent to distribute, and to  
20 distribute, a Schedule I controlled substance, to wit: one kilogram or more of a mixture or  
21 substance containing a detectable amount of heroin, in violation of Title 21, United States Code,  
22 Section 846.



1 COUNT TWO: (21 U.S.C. 843(b))

2 On or about March 28, 2001, at approximately 6:21 p.m., the defendants

3 LUIS MANUEL GARCIA HERNANDEZ,  
4 a/k/a Piojo, and  
5 HERIBERTO CORIA-CERDA,  
6 a/k/a Eddie

7 did knowingly and intentionally use a communication facility (a telephone), in committing,  
8 causing, and facilitating the commission of a violation of Title 21, United States Code  
9 Section 846 (a conspiracy to distribute heroin on March 28, 2001), all in violation of Title 21,  
10 United States Code, Section 843(b).

11 COUNT THREE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

12 On or about May 21, 2001, in the Northern District of California, the defendants

13 JAVIER LNU and  
14 JUAN CARLOS CHAVEZ

15 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
16 controlled substance, to wit: one kilogram or more of a mixture or substance containing a  
17 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
18 Title 18, United States Code, Section 2.

19 COUNT FOUR: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

20 On or about May 22, 2001, in the Northern District of California, the defendants

21 RAMIRO LUCATERO HERNANDEZ,  
22 a/k/a Millo,  
23 FERNANDO LUCATERO PENA,  
24 a/k/a Salvador Jimenez,  
25 a/k/a Elodio Lucatero Arreguin,  
26 a/k/a Chava, and  
27 LUIS MANUEL GARCIA HERNANDEZ,  
28 a/k/a Piojo

29 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
30 controlled substance, to wit: one kilogram or more of a mixture or substance containing a  
31 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and

1 Title 18, United States Code, Section 2.

2  
3 COUNT FIVE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

4 On or about May 22, 2001, in the Northern District of California, the defendants

5 JOSE ISABEL VALDIVIA ANDALUZ,  
a/k/a Chavelo,  
6 FRANCISCA ALVARADO LOPEZ,  
a/k/a Angelica,  
7 a/k/a Chaparra, and  
8 JOSE LUIS JARAMILLO,  
a/k/a Jaimito

9 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
10 controlled substance, to wit: 100 grams or more of a mixture or substance containing a detectable  
11 amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18,  
12 United States Code, Section 2.

13  
14 COUNT SIX: (31 U.S.C. §§ 5316 and 5322(a) and 18 U.S.C. § 2)

15 On or about May 22, 2001, in the Northern District of California, the defendants

16 LUIS MANUEL GARCIA HERNANDEZ,  
a/k/a Piojo, and  
17 LUISA HERNANDEZ ESPINOSA  
a/k/a Luisa Lucatero-Hernandez

18 were knowingly and willfully about to transport monetary instruments of more than ten thousand  
19 dollars (\$10,000) at one time, that is, approximately \$56,000, from a place in the United States  
20 (to wit, San Francisco International Airport) to a place outside the United States (to wit, Mexico)  
21 without filing a Report of International Transportation of Currency or Monetary Instruments  
22 (Customs Form 4790), as required by Title 31, Code of Federal Regulations, Section 103.23, in  
23 violation of Title 31, United States Code, Sections 5316(a)(1)(A) and 5322(a); 31 Code of  
24 Federal Regulations, Section 103.23; and Title 18, United States Code, Section 2.

1 COUNT SEVEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about June 4, 2001, in the Northern District of California, the defendants

3 LUIS MANUEL GARCIA HERNANDEZ,  
4 a/k/a Piojo,  
5 TEOFILO MEDINA-GUIZAR, and  
6 LEO LNU

7 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
8 substance, to wit: one kilogram or more of a mixture or substance containing a detectable  
9 amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18,  
10 United States Code, Section 2.

11 COUNT EIGHT: (21 U.S.C. § 841(a)(1))

12 On or about June 19, 2001, in the Northern District of California, the defendant

13 TEOFILO MEDINA-GUIZAR

14 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
15 substance, to wit: 100 grams or more of a mixture or substance containing a detectable amount  
16 of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United  
17 States Code, Section 2.

18 COUNT NINE: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

19 On or about July 12, 2001, in the Northern District of California, the defendant

20 MIGUEL ANGEL MENDOZA

21 did knowingly and intentionally possess with intent to distribute a Schedule I controlled  
22 substance, to wit: one kilogram or more of a mixture or substance containing a detectable  
23 amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18,  
24 United States Code, Section 2.  
25  
26  
27  
28

1 COUNT TEN: (21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2)

2 On or about July 18, 2001, in the Northern District of California, the defendants

3 RAMIRO LUCATERO HERNANDEZ,  
4 a/k/a Millo,  
5 ALEJANDRO BERBER BARRETO,  
6 a/k/a Alex, and  
7 LUIS MANUEL GARCIA HERNANDEZ,  
8 a/k/a Piojo

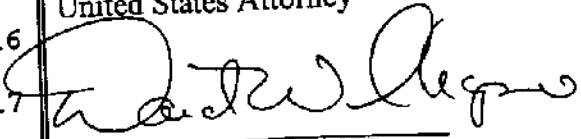
9 did knowingly and intentionally possess with intent to distribute, and distribute, a Schedule I  
10 controlled substance, to wit: one kilogram or more of a mixture or substance containing a  
11 detectable amount of heroin, in violation of Title 21, United States Code, Section 841(a)(1) and  
12 Title 18, United States Code, Section 2.


13 DATED: 12/18/01

A TRUE BILL.

14   
FOREPERSON

15 DAVID W. SHAPIRO  
16 United States Attorney

17   
18 LESLIE R. CALDWELL  
19 Chief, Criminal Division

20 (Approved as to form: )

AUSA BUNZEL